

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

JASON C. FRITTON, MAREA GIBSON,)
BRIAN W. MOTZENBEEKER, DAWN)
DUFF, and CHRISTOPHER)
SHEARMAN, individually and on behalf)
of all others similarly situated,)

Plaintiffs,)

v.)

TAYLOR CORPORATION, the BOARD)
OF DIRECTORS OF TAYLOR)
CORPORATION, the FIDUCIARY)
INVESTMENT COMMITTEE, and JOHN)
DOES 1-30,)

Defendants.)

CIVIL ACTION NO.:
22-cv-00415-ECT-HB

**STIPULATION FOR EXTENSION
OF TIME FOR DEFENDANTS TO
RESPOND TO PLAINTIFFS’
COMPLAINT**

Plaintiffs Jason C. Fritton, Marea Gibson, Brian W. Motzenbecker, Dawn Duff, and Christopher Shearman (collectively, “Plaintiffs”) and Defendants Taylor Corporation, Board of Directors of Taylor Corporation and Fiduciary Investment Committee (collectively, “Defendants”) (collectively, Plaintiffs and Defendants are the “Parties”), by their undersigned counsel, hereby stipulate and agree as follows:

1. Plaintiffs filed their Complaint in this action on February 14, 2022 and served it on Defendants on February 22, 2022. (ECF Nos. 1, 9-11.)
2. Under Federal Rule of Civil Procedure 12(a), the deadline for Defendants to respond to the Complaint is March 15, 2022.

3. The Parties stipulate and agree that Defendants may have a brief extension, through April 15, 2022, to move, file, answer or otherwise respond to the Complaint.

4. The Parties stipulate and agree that good cause exists for Defendants' requested extension in light of the number and nature of the allegations asserted in the Complaint, and they further stipulate and agree that the extension will not prejudice Plaintiffs.

5. The Parties further acknowledge that Defendants intend to file a motion to dismiss pursuant to Rule 12(b) of the Federal Rules of Civil Procedure. In the event that Defendants file such a motion, the Parties hereby stipulate and agree to the following briefing schedule:

- a. Defendants shall file their motion, along with any supporting documents required or permitted under District of Minnesota Local Rule 7.1(c)(1), on or before April 15, 2022.
- b. Plaintiffs shall file their memorandum in opposition, along with any documents required or permitted under District of Minnesota Local Rule 7.1(c)(2), on or before May 16, 2022.
- c. Defendants shall file their reply memorandum, along with any documents required or permitted under District of Minnesota Local Rule 7.1(c)(3), on or before June 1, 2022.

6. The Parties respectfully request that the Court enter an order reflecting the extension and briefing schedule set forth in this Stipulation and agree that such an order may be entered without further notice to the Parties.

Dated: March 10, 2022

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